

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

CHEVRON CORPORATION,

Plaintiff,

v.

STEVEN DONZIGER, et al.,

Defendants.

Case No. 11 Civ. 0691 (LAK)

NOTICE OF MOTION

PLEASE TAKE NOTICE that upon the accompanying memorandum of law, and upon all prior proceedings herein, the Republic of Ecuador (“the Republic”) will move this Court before the Honorable Lewis A. Kaplan, United States District Judge, United States Courthouse, 500 Pearl Street, New York, New York 10007, in Courtroom 12D at a date a time to be determined by the Court for an order pursuant to Rules 24(a) and (b) of the Federal Rules of Civil Procedure permitting the Republic to intervene.

Respectfully submitted,

WINSTON & STRAWN LLP

Dated: New York, New York
October 10, 2013

/s/ C. MacNeil Mitchell
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